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(509) 884-9541 ◆ Fax: (509) 884-4805

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captioned matter. This declaration is based on my personal knowledge and I am competent to testify about the matters asserted herein.

- 2. Attached as Exhibit A are true and correct copies of excerpts from the Verbatim Report of Proceedings, Testimony of Jennifer Lane taken before the Honorable Lonny R. Suko, United States District Judge on July 11, 2011, in the case <u>Gutierrez v. Grant County</u>, U.S. District Court Cause No. CV-10-00048-LRS.
- 3. Attached as Exhibit B are true and correct copies of excerpts from the deposition transcript of Jennifer Lane taken on October 3, 2012.
- 4. Attached as Exhibit C are true and correct copies of excerpts from the deposition transcript of Jalane Christian-Stoker taken on August 23, 2012.
- 5. Attached as Exhibit D are true and correct copies of excerpts from the deposition transcript of Jalane Christian-Stoker taken on March 9, 2011, from the case <u>Gutierrez v. Grant County</u>, U.S. District Court Cause No. CV-10-00048-LRS.

DECLARATION OF STEVEN C. LACY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT
RE: KEY EMPLOYEE DEFENSE
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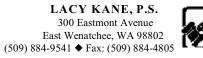
FOR SUMMARY JUDGMENT

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RE: KEY EMPLOYEE DEFENSE

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1	Date/Position Opening obtained by the plaintiff in course of discovery.
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4	I hereby declare under penalty of perjury, pursuant to the laws of the
5	State of Washington, that the foregoing declaration is true and accurate in all
6	
7	respects.
8	DATED this 24 th day of October, 2012.
9	
10	
11	/s Steven C. Lacy STEVEN C. LACY, WSBA # 10814
12	Attorney for Plaintiff
13	Lacy Kane, P.S.
14	300 Eastmont Ave. East Wenatchee, WA 98802
15	Telephone: (509) 884-9541
16	Fax: (509) 884-4805 Email:steve@lacykane.com
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27	DECLARATION OF STEVEN C. LACY IN SUPPORT OF PLAINTIFF'S MOTION LACY KANE, P.S.
28	FOR SUMMARY JUDGMENT RE: KEY EMPLOYEE DEFENSE 300 Eastmont Avenue East Wenatchee, WA 98802
20	c5:Lane-j.fmla\pleading\dosclisopmolpmfsj.kei 4 (509) 884-9541 ♦ Fax: (509) 884-4805



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DECLARATION OF STEVEN C. LACY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT
RE: KEY EMPLOYEE DEFENSE
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JERRY J. MOBERG PATRICK R. MOBERG

451 Diamond Drive Ephrata, WA 98823

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on October 24th, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

LACY KANE, P.S.

BY s/ Steven C. Lacy
STEVEN C. LACY, WSBA # 10814
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